

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION  
CHARLENE CARTER, )

[illegible]

SOUTHWEST AIRLINES CO., ) NO.: 3:17-cv-02278-X  
AND TRANSPORT WORKERS )  
UNION OF AMERICA, LOCAL )  
556, )  
)  
Defendants. )

VIDEOCONFERENCE ORAL AND VIDEOTAPED DEPOSITION OF  
SONYA LACORE  
JUNE 24, 2022

VIDEOCONFERENCE ORAL AND VIDEOTAPED DEPOSITION  
OF SONYA LACORE, produced as a witness at the  
instance of the Plaintiff, and duly sworn, was  
taken in the above-styled and numbered cause on  
June 24, 2022, from 9:57 a.m. to 11:17 a.m., via  
Zoom Videoconference, before Melody A. Monk, CSR  
in and for the State of Texas, reported by machine  
shorthand, with the witness located in Dallas,

**APPEARANCES**  
(All parties appearing via Zoom Videoconference)

FOR THE PLAINTIFF:

**BOBBY G. PRYOR**  
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FOR THE DEFENDANT SOUTHWEST AIRLINES CO.:

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FOR THE DEFENDANT TRANSPORT WORKERS UNION OF AMERICA AND LOCAL 556:

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Texas, pursuant to the Federal Rules of Civil Procedure, and the provisions stated on the record or attached hereto.

ADAM S. GREENFIELD  
Cloutman & Greenfield, PLLC  
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Agreenfield@candglegal.com

ALSO PRESENT:

Lisa Block, Videographer  
Charlene Carter  
Chris Maberry, Senior Attorney - Southwest Airlines  
Kerrie Forbes, Associate General Counsel - Southwest Airlines  
Lauren Armstrong, Paralegal - Southwest Airlines

1 (Pages 1 to 4)

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## EXHIBIT 4

## APP 23

Sonya Lacore

Page 25	Page 27
<p>1 here today, correct?</p> <p>2 MR. MCKEEBY: What, what question?</p> <p>3 MR. PRYOR: The question of does she</p> <p>4 know whether or not she can still assist the union</p> <p>5 in kicking people off of committees, nonunion</p> <p>6 objectors.</p> <p>7 Q. Do you know?</p> <p>8 A. I have a team of experts that work on</p> <p>9 that, and so I delegate every bit of that work.</p> <p>10 They --</p> <p>11 Q. Let's look at Exhibit --</p> <p>12 A. -- they will know.</p> <p>13 Q. Oh, I'm sorry.</p> <p>14 Okay. You, you rely on someone else</p> <p>15 for that, correct?</p> <p>16 A. That is correct.</p> <p>17 Q. Who is Brian -- how do you pronounce his</p> <p>18 last name, Talburt?</p> <p>19 A. Brian is a flight attendant.</p> <p>20 Q. Okay. And someone that you knew certainly</p> <p>21 back as of 2014, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Did you know him before then?</p> <p>24 A. Yes. Flight attendant in Phoenix.</p> <p>25 Q. So how long had you known him? How long</p>	<p>1 A. Corliss is a flight attendant and also</p> <p>2 currently serves on, on the union team.</p> <p>3 Q. And he says, The attitude she spawns is</p> <p>4 Northwest Airlines in the '80s. People listen and</p> <p>5 people read.</p> <p>6 Do you know how what he's talking</p> <p>7 about, how she's dangerous, incredibly dangerous?</p> <p>8 A. I don't know what he -- I, I can't assume</p> <p>9 what he meant.</p> <p>10 Q. Okay. I'm asking how you understood it.</p> <p>11 Let's try that.</p> <p>12 A. Brian is someone who -- frequent pen pal,</p> <p>13 and he is very passionate when he doesn't agree</p> <p>14 with things that people do or say, and so I can</p> <p>15 only assume that's what he meant.</p> <p>16 Q. He says -- then he says, I am all about</p> <p>17 targeted assassinations.</p> <p>18 Now, if you read this e-mail, maybe</p> <p>19 you'll remember that, maybe that will help you</p> <p>20 recall, but he's talking about targeted</p> <p>21 assassinations using social media.</p> <p>22 Do you recall that?</p> <p>23 MR. MCKEEBY: What, what, what is it?</p> <p>24 Where is that? Where does it say social media?</p> <p>25 MR. PRYOR: Go to the next paragraph.</p>
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<p>1 have you known him as you sit here today, I guess?</p> <p>2 A. I probably met him when I was a leader in</p> <p>3 the Phoenix space in 2007 or 2008.</p> <p>4 Q. Okay. So do you recognize this e-mail,</p> <p>5 the portion that's on the screen?</p> <p>6 A. I -- Brian sent me a lot of e-mails. So I</p> <p>7 can read it right now, but I don't remember.</p> <p>8 Q. I'm gonna read it to you.</p> <p>9 You didn't -- you haven't seen this</p> <p>10 document in the last few days?</p> <p>11 A. No, sir.</p> <p>12 Q. So, first of all, I note that he sends it</p> <p>13 to a different e-mail address than the one you</p> <p>14 identified as your business address before,</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. All right. And he says, So my final</p> <p>18 installment on this subject. Shipman stepped up</p> <p>19 to the plate. It is maddening trying to reason</p> <p>20 with these sheeple. The issue becomes the tumor.</p> <p>21 Then he goes on to say -- I'm going to</p> <p>22 read a couple of lines down -- Corliss</p> <p>23 particularly is something we have not seen before</p> <p>24 and is incredibly dangerous.</p> <p>25 Who is Corliss?</p>	<p>1 Q. Social media is by far the major source of</p> <p>2 reach and must be used to our advantage.</p> <p>3 He's talking about using social media</p> <p>4 for targeted assassinations. You don't recall</p> <p>5 that?</p> <p>6 MR. GREENFIELD: Objection, form.</p> <p>7 A. I don't remember this. I --</p> <p>8 Q. Okay.</p> <p>9 A. What I can tell you is Brian later got</p> <p>10 into some challenges with his own social media</p> <p>11 posts, and I know my team investigates that.</p> <p>12 Q. Well, you certainly didn't have them</p> <p>13 investigate this one, the one he sent you, did</p> <p>14 you?</p> <p>15 A. I don't remember if I did or not.</p> <p>16 Q. Oh. So --</p> <p>17 A. I get a lot of e-mail.</p> <p>18 Q. -- once again, we look forward to</p> <p>19 Southwest showing us the documents where you</p> <p>20 reported him for this comment. I want to read</p> <p>21 something else in here.</p> <p>22 MR. MCKEEBY: Object to the sidebar.</p> <p>23 Q. In that same paragraph about --</p> <p>24 MR. MCKEEBY: Just ask, ask the</p> <p>25 witness questions, please.</p>

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**APP 24**

Sonya Lacore

<p style="text-align: right;">Page 45</p> <p>1 A. I think it would have depended on all of 2 the details of what I would have done with that. 3 I am seeing this now for the first time, so I, I 4 don't -- I can't really say what I would do. 5 Q. By the way, who is Julie O'Grady? 6 A. Julie wor -- I believe that she worked in 7 employee relations. 8 Q. And she says, At this time, I do not have 9 the specific page or wall where this content was 10 found. Please work with labor relations and your 11 HR business partner to address this matter. 12 Why would anyone be referring this to 13 labor relations unless you were trying to help the 14 union with people that didn't like the union? 15 A. I -- 16 MR. MCKEEBY: Object to the form of 17 the question as -- 18 Q. I -- I'm giving, I'm giving you the chance 19 to come up with any explanation you can think of 20 for -- 21 MR. MCKEEBY: She's -- 22 Q. -- Southwest management. 23 MR. MCKEEBY: She's already testified 24 she doesn't -- hasn't seen this e-mail. She's not 25 the -- she's not a recipient.</p>	<p style="text-align: right;">Page 47</p> <p>1 in many roles. So I'm not sure what role she was 2 in here. Oh, manager of labor relations. 3 Q. And do you see this e-mail from her 4 regarding the social media posts where she says, I 5 couldn't find much with Greg's name on it. 6 Do you know who Greg is? 7 A. I don't know who she's talking about right 8 here. 9 Q. Okay. But I'm happy to keep looking. I 10 did take screenshots of his most recent posts, and 11 I think there's an interesting pattern of trying 12 to milk the company for money and topple the 13 union. Do you want me to dig further? 14 You know nothing about this e-mail? 15 A. I do not. 16 Q. What would you have done with this e-mail 17 if you had received it? 18 A. I would send it to my team and let them 19 determine what the next steps are. 20 Q. 84 -- 6351. 21 Were you involved or receive any 22 information about the Step 1 or Step 2 process 23 involving Charlene? 24 A. I'm not involved in the process. 25 Q. So what involvement did you have?</p>
<p style="text-align: right;">Page 46</p> <p>1 So you can answer as best you can. 2 A. I can't even begin to know what Julie was 3 saying because I, I didn't this write e-mail. 4 Q. Would you have directed to labor 5 relations -- if, if, if Brian Talburt had sent you 6 an e-mail with all these union objectors on there 7 that he's been searching their Facebook pages and 8 wants Southwest to take action against them, and 9 knowing what you know from his targeted 10 assassination e-mail with you, would you have sent 11 it to labor relations? 12 A. I would -- 13 MR. MCKEEBY: Object to the form as 14 hypothetical. 15 You can answer. 16 A. I would send it to my team of experts that 17 work on that, because I have a team that's very 18 good at this. And I -- honestly, that's why 19 sometimes I will do an FYI and let them take it 20 from there. 21 Q. Who's Maureen Emlet, or I may have said 22 the wro -- yeah, Maureen Emlet? 23 A. Are you asking me who she is? 24 Q. I am. 25 A. She was a base manager -- well, she served</p>	<p style="text-align: right;">Page 48</p> <p>1 A. What about what? 2 Q. You just said -- 3 A. I couldn't hear you. 4 Q. -- not that aspect. What are you -- you 5 said not that aspect, and I said, okay, what 6 aspect did you have involvement? 7 A. I said I'm not involved in the prospect -- 8 in the process of Step 1, Step 2 hearings. 9 Q. Okay. And so, therefore, when you said 10 not involved in that aspect, did you mean to 11 indicate you were involved in some other aspect? 12 A. I'm not involved in the pro -- in those 13 processes. Do people come and let me know that 14 there is a, a case going on, maybe, maybe not. 15 Depends. But I, I intentionally do not involve 16 myself in the process. 17 Q. Did you search your personal e-mails for 18 all e-mails you had with Brian Talburt for 19 production in this lawsuit? 20 A. Did I search my what? I -- I'm sorry, I'm 21 having really a tough time -- 22 Q. Your, your pers -- and I'm sorry. 23 Did you search your personal e-mails 24 to produce in this lawsuit all e-mails you had 25 with Brian Talburt?</p>

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**APP 25**

Sonya Lacore

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<p>1 A. I, I did not.</p> <p>2 Q. What's your education?</p> <p>3 A. What's my education?</p> <p>4 Q. You don't need to repeat the question</p> <p>5 unless you just didn't hear it.</p> <p>6 A. I shouldn't --</p> <p>7 MR. MCKEEBY: Well, she didn't hear</p> <p>8 it. She didn't hear it. That's why she repeated</p> <p>9 it.</p> <p>10 A. I'm not, I'm not trying to be difficult</p> <p>11 here. I'm really having a challenge hearing you,</p> <p>12 and I wanted to make sure that I understood you.</p> <p>13 So if you're asking me what my</p> <p>14 education is, I have a high school education and</p> <p>15 two years of college. I do not have a college</p> <p>16 degree.</p> <p>17 Q. Why can you not be at trial in this case?</p> <p>18 A. I have some commitments that I had</p> <p>19 previously prepared for, and it just is really</p> <p>20 difficult for me to be away.</p> <p>21 Q. By the way, I had some commitments too.</p> <p>22 I, I changed them. Tell me about your</p> <p>23 commitments.</p> <p>24 A. I'm happy to. The, the first week -- I'm</p> <p>25 assuming you're talking about the dates of the 5th</p>	<p>1 state for the record that I, I did call Paulo</p> <p>2 before this deposition and let him know that if</p> <p>3 this witness was available for trial, we would not</p> <p>4 take the deposition, and he said she was</p> <p>5 unavailable and if that was not the case, he would</p> <p>6 check. In our view, that is not unavailable, and</p> <p>7 although we've taken this deposition, we will</p> <p>8 subpoena her for trial.</p> <p>9 I'm gonna take a break, ma'am. I'm</p> <p>10 gonna stop my little clock here, and give me ten</p> <p>11 minutes. Thanks.</p> <p>12 THE VIDEOGRAPHER: Going off the</p> <p>13 record at 10:51.</p> <p>14 (Recess).</p> <p>15 THE VIDEOGRAPHER: We are back on the</p> <p>16 record with Clip 2 at 11:05.</p> <p>17 Q. Ma'am, if you'll look at Exhibit 26.</p> <p>18 (Exhibit 26 marked).</p> <p>19 Q. We looked at this before, it's Exhibit</p> <p>20 twen -- Trial Exhibit 26. In this e-mail, where</p> <p>21 it says, As I told VdV, can you tell --</p> <p>22 MR. MCKEEBY: Are you pulling --</p> <p>23 Q. -- me who that is?</p> <p>24 MR. MCKEEBY: Are you pulling it up?</p> <p>25 MR. PRYOR: Oh, oh, I'm sorry. I've</p>
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<p>1 through the 8th? I am --</p> <p>2 Q. No, I'm not, ma'am. No, ma'am, I'm</p> <p>3 talking about July 5th through July 12th.</p> <p>4 A. Okay. Okay.</p> <p>5 Q. Are you available for trial any of those</p> <p>6 days?</p> <p>7 A. I am not, and I'm happy to share why. I,</p> <p>8 I have very little opportunity to spend time with</p> <p>9 my family when they're in town, and the week after</p> <p>10 the Fourth they're coming in and they're spending</p> <p>11 time with me. And my niece and her husband have</p> <p>12 three children, and my nephew is undergoing -- at</p> <p>13 age 34 is undergoing cancer for melanoma, is</p> <p>14 undergoing treatment, and my husband and I have</p> <p>15 promised to baby-sit their children during that</p> <p>16 time because we are like grandparents to them.</p> <p>17 They, they have very little support.</p> <p>18 The following week, I am traveling</p> <p>19 because I have commitments to speak at a</p> <p>20 hospitality summit, and I also have a, a --</p> <p>21 produced a schedule of a town hall in one of the</p> <p>22 bases in Atlanta. And when we produce a town hall</p> <p>23 for our people, we don't cancel it because they</p> <p>24 bid their schedules around these.</p> <p>25 MR. PRYOR: All right. I'll just</p>	<p>1 gotta share screen.</p> <p>2 MR. MCKEEBY: Yeah, no worries.</p> <p>3 MR. PRYOR: Yes, I will, yes, I will</p> <p>4 pull it up. I thought I was. Let me share</p> <p>5 screen. Okay. Maybe that's it. I may have the</p> <p>6 wrong one up there, but I'll get the right one</p> <p>7 now.</p> <p>8 Q. Okay. We talked about this e-mail, it's</p> <p>9 Exhibit 26. In the middle of the first paragraph,</p> <p>10 it says, As I told VdV.</p> <p>11 Do you know who that is?</p> <p>12 MR. MCKEEBY: I, I still don't think</p> <p>13 you have the right -- Bobby, I don't think you</p> <p>14 have the right document pulled up. At least I</p> <p>15 don't have it on my screen.</p> <p>16 MR. PRYOR: What, what are you guys,</p> <p>17 what are you guys looking at?</p> <p>18 MR. MCKEEBY: I've got the --</p> <p>19 MR. PRYOR: You're looking at Exhibits</p> <p>20 --</p> <p>21 MR. MCKEEBY: -- the deposition</p> <p>22 notice.</p> <p>23 THE WITNESS: Same.</p> <p>24 MR. PRYOR: Huh. Mine says -- new</p> <p>25 share then. Let's try that. Yes, how about this.</p>

13 (Pages 49 to 52)

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**APP 26**

Sonya Lacore

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1	punished?	1	CHANGES AND SIGNATURE
2	MR. MCKEEBY: Same objection.	2	WITNESS NAME: SONYA LACORE DATE: JUNE 24, 2022
3	A. I believe --	3	PAGELINE CHANGE REASON
4	MR. MCKEEBY: Counsel, you need to	4	
5	wrap up.	5	
6	Q. I am. I -- you -- what was your answer	6	
7	and then I'll conclude. What was your answer?	7	
8	A. I believe in the process, and I -- that's,	8	
9	that's my answer. I trust the process.	9	
10	MR. PRYOR: All right. I've already	10	
11	stated on the record our position on this. And I	11	
12	do think I'm at the one-hour mark, and maybe	12	
13	slightly over, but if you count all the colloquy,	13	
14	and there frankly wasn't that much, I think I'm	14	
15	right at it. I appreciate your patience, Counsel,	15	
16	because we had a lot to cover in a short period of	16	
17	time. I pass the witness.	17	
18	MR. MCKEEBY: No questions at this	18	
19	time. Thank you, Ms. Lacore.	19	
20	THE VIDEOGRAPHER: Going off the	20	
21	record at 11:17.	21	
22	THE REPORTER: What about signature?	22	
23	MR. PRYOR: Hang on. What about, what	23	
24	about Ed?	24	
25	MR. GREENFIELD: You need to ask the	25	
Page 62		Page 64	
1	union, to get us on the record, please.	1	
2	MR. MCKEEBY: Fine. Sorry, Ed.	2	
3	MR. CLOUTMAN: We have no questions.	3	I, SONYA LACORE, have read the foregoing
4	THE VIDEOGRAPHER: Going off the	4	deposition and hereby affix my signature that same
5	record at 11:17.	5	is true and correct, except as noted above.
6	THE REPORTER: Signature?	6	
7	MR. PRYOR: Thank you.	7	
8	MR. MCKEEBY: Yeah, we'll read and	8	
9	sign, if you'll send it to me, as the one -- same	9	
10	as the one yesterday. Same, same copy request as	10	SONYA LACORE
11	well.	11	
12	MR. CLOUTMAN: As with us.	12	THE STATE OF _____)
13	THE REPORTER: Anyone else?	13	COUNTY OF _____)
14	MR. CLOUTMAN: Yes, the union wants a	14	
15	condensed copy only.	15	Before me, _____, on
16	THE REPORTER: Mr. Greenfield?	16	this day personally appeared SONYA LACORE, known
17	MR. GREENFIELD: Yes.	17	to me (or proved to me under oath or through
18	(Deposition concluded at 11:17 a.m.)	18	_____) (description of
19		19	identity card or other document)) to be the person
20		20	whose name is subscribed to the foregoing
21		21	instrument and acknowledged to me that they
22		22	executed the same for the purposes and
23		23	consideration therein expressed.
24		24	Given under my hand and seal of office
25		25	this _____ day of _____,

16 (Pages 61 to 64)

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APP 27

Sonya Lacore

<p style="text-align: right;">Page 65</p> <p>1 _____.</p> <p>2</p> <p>3</p> <p>4</p> <p>5 NOTARY PUBLIC IN AND FOR THE STATE OF _____ COMMISSION EXPIRES: _____</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 67</p> <p>1 That the amount of time used by each party at 2 the deposition is as follows: 3 BOBBY G. PRYOR.....01 HOUR(S):06 MINUTE(S) 4 That pursuant to information given to the 5 deposition officer at the time said testimony was 6 taken, the following includes counsel for all 7 parties of record: 8 FOR THE PLAINTIFF: 9 MATTHEW D. HILL Pryor &amp; Bruce 10 302 North San Jacinto Rockwall, Texas 75087 11 972.771.3933 Mhill@pryorandbruce.com 12 13 MATTHEW B. GILLIAM National Right to Work Legal Defense 14 Foundation, Inc. 8001 Braddock Road 15 Suite 600 Springfield, Virginia 22160 16 703.321.8510 Mbg@nrtw.org 17 18 19 FOR THE DEFENDANT SOUTHWEST AIRLINES CO.: 20 PAULO B. MCKEEBY Reed Smith 21 2850 North Harwood Street Suite 1500 22 Dallas, Texas 75201 Pmckeeby@reedsmith.com 23 24 25</p>
<p style="text-align: right;">Page 66</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE NORTHERN DISTRICT OF TEXAS 3 DALLAS DIVISION CHARLENE CARTER, ) 4 Plaintiff, ) 5 VS. ) CIVIL ACTION 6 ) NO.: 3:17-cv-02278-X SOUTHWEST AIRLINES CO., ) 7 AND TRANSPORT WORKERS ) UNION OF AMERICA, LOCAL ) 8 556, ) 9 Defendants. )</p> <p>10</p> <p>11 REPORTER'S CERTIFICATION 12 DEPOSITION OF SONYA LACORE 13 JUNE 24, 2022</p> <p>14</p> <p>15 I, Melody A. Monk, Certified Shorthand 16 Reporter in and for the State of Texas, hereby 17 certify to the following: 18 That the witness, SONYA LACORE, was duly sworn 19 by the officer and that the transcript of the oral 20 deposition is a true record of the testimony given 21 by the witness; 22 That the deposition transcript was submitted 23 on June 29, 2022 to the witness or to the attorney 24 for the witness for examination, signature and 25 return to me by July 28, 2022;</p>	<p style="text-align: right;">Page 68</p> <p>1 FOR THE DEFENDANT TRANSPORT WORKERS UNION OF 2 AMERICA LOCAL 556: 3 EDWARD B. CLOUTMAN, III Law Offices of Edward Cloutman III 3301 Elm Street 4 Dallas, Texas 75226 214.232.9015 5 Ecloutman@lawoffices.email 6 7 ADAM S. GREENFIELD Cloutman &amp; Greenfield, PLLC 3301 Elm Street 8 Dallas, Texas 75226 Agreenfield@candlelegal.com 9 10 That \$_____ is the deposition officer's 11 charges to the Plaintiff for preparing the 12 original deposition transcript and any copies of 13 exhibits; 14 I further certify that I am neither counsel 15 for, related to, nor employed by any of the 16 parties or attorneys in the action in which this 17 proceeding was taken, and further that I am not 18 financially or otherwise interested in the outcome 19 of the action. 20 Certified to by me this 27th day of June, 21 2022. 22 23 24 Melody A. Monk, RPR Texas CSR No. 3613 25 Expiration Date: 10/21/2022</p>

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**APP 28**

Sonya Lacore

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1 MELODY MONK REPORTING  
Firm Registration No. 10821  
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**APP 29**